

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

KOPELMAN & KOPELMAN LLP
90 Main Street, Suite 205
Hackensack, New Jersey 07601
Telephone: (201)489-5500
Fax: (201)489-7755
Michael S. Kopelman, Esq., (MK 6104)
Attorney for Defendants

Case No. 19-10132-SCC

Chapter 7

Judge:

In Re:

Adv. Proc. No.19-01111

IN SOOK STERLING

Hearing Date:

Debtor.

STRATEGIC FUNDING SOURCE, INC.,

Plaintiff,

v.

IN SOOK STERLING, MTK 38 INC. and
JAY ENTERTAINMENT CORP.

Defendants.

**ANSWER TO CROSSCLAIM OF JAY ENTERTAINMENT CORP.
AND JURY DEMAND**

Defendant, In Sook Sterling, by way of answer to the Crossclaim of Jay
Entertainment Corp. ("JEC") states as follows:

ANSWER TO ALL CROSS-CLAIMS

Defendant denies having sufficient knowledge to form a belief as to the allegations

contained in the answer to all crossclaims and leave JEC to its proofs.

**CROSSCLAIMS AGAINST DEFENDANTS,
IN SOOK STERLING AND MTK 38, INC.**

JURISDICTION

1. Defendant denies the allegations contained in ¶ 1 of the crossclaims.

FACTS COMMON TO ALL COUNTS

2. Defendant admits the allegations contained in ¶ 2 of the crossclaims.
3. Defendant denies the allegations contained in ¶ 3 of the crossclaims.
4. Defendant denies having sufficient knowledge to form a belief as to the allegations contained in ¶ 4 of the crossclaims and leaves JEC to its proofs.

5. Defendant denies having sufficient knowledge to form a belief as to the allegations contained in ¶ 5 of the crossclaims and leaves JEC to its proofs.

6. Defendant denies having sufficient knowledge to form a belief as to the allegations contained in ¶ 6 of the crossclaims and leaves JEC to its proofs.

7. Defendant denies having sufficient knowledge to form a belief as to the allegations contained in ¶ 7 of the crossclaims and leaves JEC to its proofs.

8. Defendant denies the allegations contained in ¶ 8 of the crossclaims.

9. Defendant denies the allegations contained in ¶ 9 of the crossclaims.

**FIRST COUNT
(Common Law Defense and Indemnification)**

10. Defendant repeats and incorporates her responses to paragraphs 1 through 9 above as if set forth at length herein.

11. Defendant denies having sufficient knowledge to form a belief as to the allegations contained in ¶ 11 of the crossclaims and leaves JEC to its proofs.

12. Defendant denies having sufficient knowledge to form a belief as to the allegations contained in ¶ 12 of the crossclaims and leaves JEC to its proofs.

SECOND COUNT
(Unjust Enrichment)

13. Defendant repeats and incorporates her responses to paragraphs 1 through 12 above as if set forth at length herein.

14. Defendant denies the allegations contained in ¶ 14 of the crossclaims.

15. Defendant denies having sufficient knowledge to form a belief as to the allegations contained in ¶ 15 of the crossclaims and leaves JEC to its proofs.

16. Defendant denies having sufficient knowledge to form a belief as to the allegations contained in ¶ 16 of the crossclaims and leaves JEC to its proofs.

17. Defendant denies the allegations contained in ¶ 17 of the crossclaims.

18. Defendant denies the allegations contained in ¶ 18 of the crossclaims.

FIRST SEPARATE DEFENSE

The crossclaims of Jay Entertainment Corp. against In Sook Sterling fail to state a claim upon which relief can be granted.

SECOND SEPARATE DEFENSE

The alleged crossclaims of Jay Entertainment Corp. against In Sook Sterling arose pre-petition. Jay Entertainment Corp. has failed to file an exception to discharge pursuant

to 11 U.S.C. § 523 or an objection to discharge pursuant to 11 U.S.C. § 727. Therefore, Jay Entertainment Corp's cross claims against In Sook Sterling are barred.

JURY DEMAND

In Sook Sterling hereby demands trial by jury with respect to crossclaims of Jay Entertainment Corp.

WHEREFORE, Defendant In Sook Sterling demands judgment dismissing JEC's crossclaims.

KOPELMAN & KOPELMAN LLP
Attorneys for In Sook Sterling

/s/ Michael S. Kopelman
By: Michael S. Kopelman, Esq.

Dated: October 3, 2019